

## REMARKS

Applicants respectfully traverse and request reconsideration.

Claims 1-27 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,629,097 (Keith). The independent claims have been amended to include language from dependent claims and as such, have been amended to form.

Claim 3 requires, among other things, a knowledge container administration module that modifies a template descriptor item and operative to create knowledge transformation information by extrapolating data from a raw data item capable of containing data representing raw data that is in one of a plurality of different formats. The office action cites column 25, line 53 through column 26, line 19 as allegedly teaching this subject matter. However, Keith merely describes a fixed matrix representation that does not appear to provide any form of knowledge transformation information by extrapolating data from a raw data item as claimed. As set forth in Applicants' Specification, such as paragraph 47 and elsewhere, the knowledge transformation information as generated may be, for example, summary data based on the raw data such as detailed statistical information such as an average, mean and mode of a force needed to cause breakage of a housing of a mobile phone. No such extrapolating of raw data is performed in Keith as cited. Accordingly, this claim is also in condition for allowance.

The corresponding dependent claims are also in condition for allowance for similar reasons.

As per claim 1, this claim also includes the limitations of original claim 2. As to claim 2, it is alleged that Keith teaches organizing raw data items that are capable of containing data representing raw data that is in one of a plurality of different formats citing to column 18, lines 18-20. The cited portion merely states that different databases such medical databases, law databases can be tapped for "input into the methods of the current invention". However, as described, each data item is only in a single format in Keith. In other words, although different databases may be

accessed, the raw data such as the business section of the New York Times is all in a single format. In contrast, Applicants claim that the raw data item is in one of a plurality of different formats. For example, as shown in FIG. 6 of Applicants' Specification, the same single raw data item 110 can be in multiple formats, for example, formatted data, unformatted data or data links. As such, a single data item that has first and second descriptors associated therewith contain one of a plurality of different formats, whereas Keith describes an input data item having a single format. Accordingly, Applicants respectfully submit that the claim is in condition for allowance.

The dependent claims add additional novel and non-obvious subject matter.

As to claim 25, Applicants respectfully reassert the relevant remarks made above with respect to claim 3 and as such, this claim is also in condition for allowance.


As to claim 27, Applicants respectfully reassert the relevant remarks made above and as such, this claim is also in condition for allowance. In addition, again as noted above with respect to claim 3, there is no knowledge container administrator module operative to create knowledge transformation information by extrapolating data from the raw data item and links the raw data item to the knowledge transformation information.

As to claims 5, 21 and 22 for example, Keith merely describes that XML information is used as "input" to a system. In contrast, the knowledge container itself is XML data blocks so that the raw data item, the first descriptor data item and the second descriptor data item are stored in XML data blocks. No such XML based approach is described in Keith. Accordingly, these claims are also in condition for allowance.

Accordingly, Applicants respectfully submit that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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